



February 19, 2008

VIA ECF

Hon. John J. Hughes  
United States District Court for the  
District of New Jersey  
Clarkson S. Fisher Federal Building and  
U.S. Courthouse, Room 6000  
402 E. State Street  
Trenton, New Jersey 08608

William J. O'Shaughnessy

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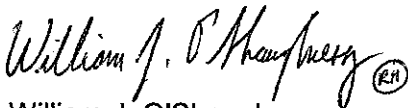
Re: Broadcom Corporation v. Qualcomm Incorporated  
Civil Action No. 05-3350 (MLC) (JJH)

Dear Judge Hughes:

In accordance with Your Honor's request, on behalf of Plaintiff Broadcom Corporation and Defendant Qualcomm Incorporated, we respectfully submit a Stipulation and Proposed Order that memorializes Your Honor's discovery rulings during the telephone conference held with the parties on January 30, 2008.

If the Stipulation meets with Your Honor's approval, we ask that you enter your "So Ordered" and forward it to the Clerk's Office for filing.

Respectfully,

  
William J. O'Shaughnessy

BOSTON

HARTFORD

NEW YORK

NEWARK

PHILADELPHIA

STAMFORD

WILMINGTON

cc: All counsel on ECF filing list

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NEW JERSEY**

BROADCOM CORPORATION,

Plaintiff,

vs.

QUALCOMM INCORPORATED,

Defendant.

Civil Action No. 3:05-CV-03350-MLC-JJH

**STIPULATION AND ORDER**

WHEREAS, the Court had a telephone conference on January 30, 2008, to address certain matters relating to discovery as set forth in separate letters submitted by counsel for Qualcomm and for Broadcom; and

WHEREAS, Broadcom and Qualcomm were preparing in August 2006 to complete their productions of documents responsive to Qualcomm's First and Second Requests for the Production of Documents and Broadcom's First Request for the Production of Documents (collectively, the "first wave" document requests) and exchange privilege logs covering those productions, but suspended such production and exchange when the Court issued the August 31, 2006, Order and Judgment; and

WHEREAS, at the conference the Court ordered that the parties complete their productions responsive to the "first wave" discovery requests for the date range up to and including September 30, 2005, and exchange privilege logs covering those productions no later than February 22, 2008; and

WHEREAS, the Court further ordered that the parties report back to the Court no later than February 22, 2008, concerning their plans for completing their productions in response

to Qualcomm's Third Request for the Production of Documents and Broadcom's Second Request for the Production of Documents (collectively, the "second wave" document requests);

**IT IS HEREBY ORDERED THAT:**

1. The parties shall complete their productions of documents in response to the first wave document requests for the date range up to and including September 30, 2005, and exchange privilege logs covering those productions no later than February 22, 2008.

**SO ORDERED:**

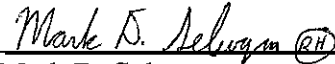
This \_\_\_\_ day of \_\_\_\_\_, 2008

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THE HONORABLE JOHN J. HUGHES

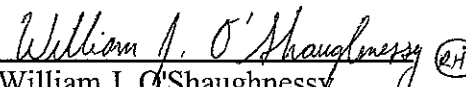
We hereby request and consent to entry of the foregoing Stipulation And Order.

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